

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

KAREN IOVINO,

Plaintiff,

v.

**MICHAEL STAPLETON ASSOCIATES, LTD.
d.b.a. MSA SECURITY, INC.,**

Defendant.

Case No. 5:21-CV-00064-TTC

**DECLARATION OF THAD M. GUYER IN RE EXTENSION OF TIME TO RESPOND
TO ORDER TO SHOW CAUSE**

Pursuant to 28 U.S. Code § 1746, I, Thad M. Guyer, hereby declare, under penalty of perjury of the laws of the United States of America, that the following is true and correct.

1. I am lead counsel in this case, admitted to law practice in 1978, and responsible for preparing the draft Response to Order to Show Cause (“Response to OSC”). My law firm is an independent contractor to the Government Accountability Project (GAP), and not an “employee” subject to day-to-day supervision.

2. The attorney assigned to review and cite check the Response to OSC, Ms. Elisabeth Connell, returned to work on Monday, August 19 with residual illness from Covid 19, and the review task is significantly time consuming. She is tasked not only with cite checking cases and articles, but ensuring fair contextual representations and accurate quotation of authorities. This is a central remedial measure that will be referenced in co-counsel John Kolar’s declaration. He is GAP’s Litigation Director.

3. One of the remedial measures for the duration of this case is that a mid-level staff attorney has to fully review all of my research based court submissions in this case if I am going to continue utilization of research and writing with generative AI (such as Westlaw's GPT chatbot), which I have informed GAP I am going to continue to do, including for my Response to the OSC. My Response to the OSC is so reputationally important to GAP that Ms. Connell's task is significant and she must share her review results with Mr. Kolar for his sign off as co-counsel.

4. The only lawyer GAP has to accomplish this remedial measure is Ms. Connell who was only hired on July 1, 2024 shortly after Kendrick Holley who had been assigned to the case left GAP employment. Stephani L. Ayers, another independent contractor was unavailable to cover Ms. Connell during her Covid absence.

Executed at Seattle, Washington this 20th day of August, 2024.

/s/ Thad M. Guyer

Thad M. Guyer
T.M. Guyer and Ayers & Friends, PC